

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

UNITED STATES OF AMERICA

PLAINTIFF

vs.

CRIMINAL NO. 3:15-cr-00067 HTW-FKB

IRB BENJAMIN

DEFENDANT

UNOPPOSED MOTION FOR CONTINUANCE

COMES NOW IRB BENJAMIN, Defendant herein, by and through undersigned counsel, and files this his Motion to Continue the Trial of this case and all corresponding deadlines, and in support thereof would show unto the Court the following:

1. That this case is presently set for trial on Tuesday, October 6, 2015 at 9:00 a.m., in the United States District Court in Jackson, Mississippi.
2. That this case is complex and the different counts of this indictment allege conduct involving contractual dealings among a number of counties and business entities, and spans a period of over 4 years. That counsel for the Defendant is in need of additional time to obtain and review the discovery; to conduct an independent investigation into the facts of the case; and to otherwise conduct legal research and adequately prepare this case for trial.
3. That as of the date of the filing of this motion, counsel for the Defendant has not received any discovery from the government.
4. That counsel has conferred with the attorney for the government and there is no objection to the relief requested by this motion on the part of the government.
5. That the Defendant expressly waives his right to a speedy trial herein.

Based on the foregoing, counsel submits that by granting this motion, the ends of justice are served in that the right of the Defendant to a fair trial outweighs the public's right to a speedy trial.

WHEREFORE, PREMISES CONSIDERED, counsel for the Defendant Irb Benjamin respectfully moves this Honorable Court to enter an order continuing the trial of this case and the applicable deadlines.

RESPECTFULLY SUBMITTED, this the 17th day of September, 2015.

/s/ Joe M. Hollomon
JOE M. HOLLOMON, ATTORNEY FOR
AND ON BEHALF OF IRB BENJAMIN

OF COUNSEL:

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CERTIFICATE OF SERVICE

I, Joe M. Hollomon, do hereby certify that I have this date electronically filed the foregoing *Unopposed Motion for Continuance* with the Clerk of the Court using the Electronic Case Filing (ECF) system, which sent notification of such filing to all counsel of record.

THIS, the 17th day of September, 2015.

/s/ Joe M. Hollomon
JOE M. HOLLOMON, ESQ.